



JOHN NAIMO
AUDITOR-CONTROLLER

**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 525
LOS ANGELES, CALIFORNIA 90012-3873
PHONE: (213) 974-8301 FAX: (213) 626-5427

January 15, 2016

TO: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: John Naimo 
Auditor-Controller

SUBJECT: **INSTITUTE FOR MULTICULTURAL COUNSELING AND EDUCATION
SERVICES, INC. – A DEPARTMENT OF MENTAL HEALTH SERVICE
PROVIDER – PROGRAM REVIEW**

We completed a program review of Institute for Multicultural Counseling and Education Services, Inc. (IMCES or Agency), which included a sample of billings from Fiscal Year (FY) 2014-15. The Department of Mental Health (DMH) contracts with IMCES to provide mental health services, including interviewing Program clients, assessing their mental health needs, and implementing treatment plans.

The purpose of our review was to determine whether IMCES maintained proper documentation to support their billings, and that the clinical documentation complied with related guidelines. In addition, we evaluated whether IMCES used qualified staff to provide services as required by their County contract.

DMH paid IMCES approximately \$3.5 million on a cost-reimbursement basis for FY 2014-15. The Agency provides services in the Second Supervisorial District.

Results of Review

IMCES completed Assessments, Client Treatment Plans, and Informed Consent forms in accordance with their County contract and related guidelines. In addition, IMCES treatment staff had the required qualifications to provide DMH Program services. However, for two (4%) of the 50 billings reviewed, IMCES inappropriately billed DMH for Mental Health Services.

IMCES' attached response indicates that they do not agree that the two billings for Mental Health Services are not allowable.

Details of our review, along with a recommendation for corrective action, is attached (Attachment I).

Review of Report

We discussed our report with IMCES and DMH. IMCES' attached response (Attachment II) indicates that they do not agree with our finding. The Agency's response states that the hospital requested the Agency to provide services to their client because the hospital did not have staff who spoke the client's language. As indicated in our report, according to the DMH Provider's Manual, Mental Health Services are not reimbursable for days the patient receives inpatient services. DMH management agreed with our finding and will work with IMCES to ensure our recommendation is implemented.

We thank IMCES management and staff for their cooperation and assistance during our review. If you have any questions please call me, or your staff may contact Don Chadwick at (213) 253-0301.

JN:AB:PH:DC:EB:nj

Attachments

c: Sachi A. Hamai, Chief Executive Officer
Robin Kay, Ph.D., Acting Director, Department of Mental Health
Tara Pir, Ph.D., Chief Executive Officer/President, IMCES
Malek E. Eversole, Ph.D., Board President, IMCES
Public Information Office
Audit Committee

**INSTITUTE FOR MULTICULTURAL COUNSELING AND
EDUCATION SERVICES, INC.
DEPARTMENT OF MENTAL HEALTH
PROGRAM REVIEW
FISCAL YEAR 2014-15**

PROGRAM SERVICES

Objective

Determine whether Institute of Multicultural Counseling and Education Services, Inc. (IMCES or Agency) maintained documentation to support the services billed to the Department of Mental Health (DMH) in accordance with their County contract and related guidelines. In addition, determine whether IMCES completed Assessments, Client Treatment Plans, Progress Notes, and Informed Consent forms in accordance with their County contract and related guidelines.

Verification

We selected 50 (3%) of the 1,835 approved Medi-Cal billings for January and February 2015, which were the most current billings available at the time of our review (October 2015). We reviewed the Assessments, Client Treatment Plans, Progress Notes, and Informed Consent forms in the clients' case files for the selected billings. The 50 billings represent services provided to 15 clients.

Results

The Agency completed Assessments, Client Treatment Plans, and Informed Consent forms in accordance with their County contract and related guidelines. However, the Agency inappropriately billed DMH for two (4%) of the 50 billings reviewed. Specifically, IMCES billed DMH for Mental Health Services provided to a client in a psychiatric inpatient hospital. According to the DMH Provider's Manual, Chapter 2, Page 34, Mental Health Services are not reimbursable for days the patient receives inpatient services. The Progress Notes described placement services related to hospital discharge which is allowable when billed as Targeted Case Management Services. The overbilling is immaterial; however, IMCES should not bill for Mental Health Services when the client received inpatient care.

Recommendation

- 1. Institute for Multicultural Counseling and Education Services, Inc. management ensure the Agency does not bill for Mental Health Services when the client is in an inpatient hospital.**

STAFFING QUALIFICATIONS

Objective

Determine whether IMCES' treatment staff had the required qualifications to provide DMH Program services.

Verification

We reviewed the California Board of Behavioral Sciences' website and/or the personnel files for 15 (25%) of the 59 treatment staff who provided services to DMH clients during January and February 2015.

Results

Each employee reviewed had the required qualifications to provide DMH Program services.

Recommendation

None.



IMCES

INSTITUTE FOR MULTICULTURAL COUNSELING & EDUCATION SERVICES

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December 7, 2015

John Naimo
County of Los Angeles
Department of Auditor-Controller
500 West Temple Street, Room 525
Los Angeles, CA 90012-3873

Dear John Naimo,

We would like to include our response to the Department of Mental Health Program Review Fiscal Year 2014-15. The Program Review acknowledged in its Results that our Agency is "in accordance with [our] County contract and related guidelines." However, the one item identified in a Recommendation is one that we would like to have brought to the appropriate authorities' attention, that "Institute for Multicultural Counseling and Education Services, Inc. management ensure the Agency does not bill for Mental Health Services when client is in an inpatient hospital."

We are aware of, and have been in compliance with that very rule. However, this particular case is an example of some segregated, disjointed separation of care that needs to be addressed at a high level. The rule is based on the assumption that the hospital has enough infrastructure to provide the very needed care. In this case, we sent our monolingual Armenian speaking client to the hospital for a very short stay, where he could not find anyone who spoke his language and was constantly asking for help. Additionally, a social worker called us directly to ask for help. Obviously, to operate on the principle of continuity of care, our staff went there to visit the client, resulting in a great deal of anxiety reduction on the part of the client, who stated "I was lost; I didn't know what to do." In addition, we practically reduced the hospital's liability for their lack of responsiveness to monolingual client. We responsibly provided services to our client that were otherwise not available. We should be praised for this rather than criticized.

This is a case of a black-and-white determination of the rule and policy. The reality is that we facilitated the integrative model of service delivery, which seems to be consistent with the overarching goal of the County's initiative. It is important to note that the very principle of our system of care is to integrate and coordinate services, specifically for example when we send a client to hospital.

This is not an isolated incident, as hospitals call frequently to ask us to assist when our monolingual clients are in the hospital. This is a call for policy and procedure to be adjusted to follow the integrated, coordinated model of service delivery.

Sincerely, .

Tara Pir, PhD

Tara Pir, PhD
CEO/President

cc: Supervisor Michael D. Antonovich, Mayor
Supervisor Hilda L. Solis
Supervisor Mark Ridley-Thomas
Supervisor Sheila Huehl
Supervisor Don Knabe
Dennis Murata
Irma Castaneda
Katherine Urbanski
Ed Vidaurri